

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 3:23-cv-00243
)	
SOUTHERN BAPTIST CONVENTION;)	Judge Campbell
GUIDEPOST SOLUTIONS LLC; and)	Magistrate Judge Frensley
EXECUTIVE COMMITTEE OF THE)	Jury Demand
SOUTHERN BAPTIST CONVENTION,)	
)	
Defendants.)	

MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Rules 5.03 and 7.01 of the Local Rules of Court and the Amended Agreed Protective Order previously entered in this action (ECF Doc. No. 83), Plaintiff Johnny M. Hunt respectfully submits this Motion for Leave to File Under Seal the unredacted version of the Reply in Support of Second Motion to Compel, as well as certain exhibits thereto, submitted by Plaintiff on February 9, 2024 (ECF Doc. No. 116) until such time as the Court adjudicates the issues.

Portions of the Reply in Support of Second Motion to Compel contain references to information that has been designated as “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” under the Amended Agreed Protective Order, which has also resulted in the public filing of the Reply in Support of Second Motion to Compel in redacted form pursuant to Local Rule 5.03(c).

As set forth in the Joint Discovery Dispute Statement submitted by Plaintiff and Guidepost on January 9, 2024 (ECF Doc. No. 100), Plaintiff’s Motion to Compel (ECF Doc. No.

106), and Plaintiff's Reply in Support of Second Motion to Compel (ECF Doc. No. 116), Plaintiff objects to and opposes Guidepost's "Highly Confidential – Attorneys' Eyes Only" designations in its document productions under the Amended Agreed Protective Order. Without conceding the propriety or the merits of the "Confidential" or "Highly Confidential – Attorneys' Eyes Only" designations by Guidepost, Plaintiff files the instant motion in an effort to ensure compliance with the Local Rules of the Court and the Amended Agreed Protective Order previously entered in this action on December 4, 2023 (ECF Doc. No. 83), until such time as the Court adjudicates the issues in the Joint Discovery Dispute Statement and Motion to Compel.

For the foregoing reasons, and without conceding the merits of the "Confidential" or "Highly Confidential – Attorneys' Eyes Only" designations by Guidepost, this Court should review the unredacted version of the Reply in Support of Second Motion to Compel under seal until such time as the Court adjudicates the issues set forth in the Motion to Compel submitted by Plaintiff on January 19, 2024 (ECF Doc. No. 106).

[SIGNATURE BLOCKS AND CERTIFICATE OF SERVICE TO FOLLOW]

Dated: February 9, 2024

Respectfully submitted,

s/ Andrew Goldstein

Todd G. Cole, Esq., BPR # 031078

Andrew Goldstein, Esq., BPR # 037042

COLE LAW GROUP, P.C.

1648 Westgate Circle, Suite 301

Brentwood, TN 37027

Telephone: (615) 490-6020

Fax: (615) 942-5914

tcole@colelawgroupc.com

agoldstein@colelawgroupc.com

-and-

Robert D. MacGill, Esq. (*pro hac vice*)

Scott E. Murray, Esq. (*pro hac vice*)

Patrick J. Sanders, Esq. (*pro hac vice*)

MACGILL PC

156 E. Market St.

Suite 1200

Indianapolis, IN 46204

Telephone: (317) 721-1253

robert.macgill@macgilllaw.com

scott.murray@macgilllaw.com

patrick.sanders@macgilllaw.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Motion for Leave to File Under Seal to be electronically filed with the Clerk of the Court on February 9, 2024, using the CM/ECF system, which will automatically serve all counsel of record listed below:

Todd G. Cole, Esq.
Andrew Goldstein, Esq.
COLE LAW GROUP, P.C.
1648 Westgate Circle, Suite 301
Brentwood, TN 37027
Telephone: (615) 326-9059
tcole@coleglawgrouppe.com
agoldstein@coleglawgrouppe.com

Robert D. MacGill, Esq.
Scott E. Murray, Esq.
Patrick J. Sanders, Esq.
MACGILL PC
156 E. Market St.
Suite 1200
Indianapolis, IN 46204
Telephone: (317) 721-1253
robert.macgill@macgilllaw.com
scott.murray@macgilllaw.com
patrick.sanders@macgilllaw.com

Counsel for Plaintiff

John R. Jacobson, Esq.
Katharine R. Klein, Esq.
RILEY & JACOBSON, PLC
1906 West End Avenue
Nashville, TN 37203
(615) 320-3700
(615) 320-3737 Facsimile
jjacobson@rjfirm.com
kklein@rjfirm.com

Scarlett Singleton Nokes, Esq.
R. Brandon Bundren, Esq.
E. Todd Presnell, Esq.
BRADLEY ARANT BOULT CUMMINGS
LLP
1600 Division Street, Suite 700
Nashville, Tennessee 37203
Telephone: (615) 244-2582
snokes@bradley.com
bbundren@bradley.com
tpresnell@bradley.com

Gene R. Besen, Esq.
BRADLEY ARANT BOULT CUMMINGS
LLP
Fountain Place
1445 Ross Avenue, Suite 3600
Dallas, Texas 75202
Telephone: (214) 257-9758
gbesen@bradley.com

Thomas J. Hurney, Jr., Esq.
Gretchen M. Callas, Esq.
JACKSON KELLY PLLC
500 Lee Street East, Suite 1600
Post Office Box 553
Charleston, West Virginia 25322
Telephone: 304-340-1000
thurney@jacksonkelly.com
gcallas@jacksonkelly.com

*Counsel for the Executive Committee of the
Southern Baptist Convention*

Steven G. Mintz, Esq.
Terence W. McCormick, Esq.
Scott Klein, Esq.
Adam Brody, Esq.
Alex Otchy, Esq.
MINTZ & GOLD LLP
600 Third Avenue
25th Floor
New York, NY 10016
Telephone: (212) 696-4848
mintz@mintzandgold.com
mccormick@mintzandgold.com
klein@mintzandgold.com
brody@mintzandgold.com
otchy@mintzandgold.com
Counsel for Defendant
Guidepost Solutions LLC

L. Gino Marchetti, Jr., Esq.
Matt C. Pietsch, Esq.
TAYLOR, PIGUE, MARCHETTI & BLAIR,
PLLC
2908 Poston Avenue
Nashville, TN 37203
Telephone: (615) 320-3225
gmarchetti@tpmblaw.com
matt@tpmblaw.com

Counsel for the Southern Baptist Convention

s/ Andrew Goldstein
Andrew Goldstein